

MICHAEL FEUER, City Attorney
KATHLEEN A. KENEALY, Chief Assistant City Attorney (SBN 212289)
SCOTT MARCUS, Senior Assistant City Attorney (SBN 184980)
GABRIEL DERMER, Assistant City Attorney (SBN 229424)
ARLENE N. HOANG, Deputy City Attorney (SBN 193395)
JESSICA MARIANI, Deputy City Attorney (SBN 280748)
200 N. Main Street, City Hall East, Room 675
Los Angeles, CA 90012
Telephone (213) 978-6952
Facsimile (213) 978-7011
scott.marcus@lacity.org

Attorneys for Defendant CITY OF LOS ANGELES

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

LA ALLIANCE FOR HUMAN RIGHTS, et al.,

Case No.: 2:20-cv-02291-DOC-KES
Assigned to Judge David O. Carter

Plaintiffs,

VS.

CITY OF LOS ANGELES, a municipal entity;
COUNTY OF LOS ANGELES, a municipal
entity; and DOES 1 through 10 inclusive,

Defendants.

**CITY OF LOS ANGELES
STATUS REPORT FOR
APRIL 14, 2020 HEARING**

Status Conference

Date: April 14, 2020

Time: 10:00 a.m.

Location: 501 S. Spring St.

Defendant City of Los Angeles (“City”) respectfully submits this status report in response to the Court’s April 10, 2020 Minute Order, in which the Court indicated its intention to start settlement discussions, initially focused on recreational vehicles in Skid Row and the surrounding area, up to and including the 10 Freeway. [Dkt. 62.]

1 The City respectfully submits the following status report, first addressing the
 2 recreational vehicles parked near San Julian and the 10 Freeway, and then providing an
 3 update on City actions more broadly.

4 **I. RECREATIONAL VEHICLES**

5 The City is reviewing options to address the recreational vehicles parked along the
 6 10 Freeway near San Julian Street. The City is aware of the recreational vehicles parked
 7 there, as there have been a number of recent fires and other issues associated with that
 8 particular RV encampment area. The City has been working since October 2019 to
 9 address concerns raised by the Los Angeles Unified School District (“LAUSD”), who
 10 maintains a parking lot for its buses nearby, along with LAUSD Police, the Los Angeles
 11 Police Department (“LAPD”), and the City’s Bureau of Sanitation (“LASAN”). This
 12 work includes engaging the Los Angeles Homeless Services Authority (“LAHSA”) to
 13 conduct outreach services to the residents of the RVs at this location. Since October
 14 2019, LAHSA has delivered a number of different services to people living in RVs in this
 15 area, ranging from food, water, and hygiene kits to referrals to mental health, crisis
 16 housing, and legal services to placing two residents in shelters.

17 As suggested by the Court, the City reached out to Plaintiffs to see what locations
 18 they could identify to relocate the RVs (if they so choose to relocate). Plaintiffs
 19 identified 8 privately owned parking lots and 3 government owned parcels (the LAUSD
 20 bus lot referred to above, and one each owned by the City and the State). The City has
 21 contacted the owner of the privately owned parking lots to discuss what rates and terms
 22 are being sought. At present, only one lot is being offered by the owner for a lease
 23 beyond the expiration of the City’s “Safer at Home” order.

24 The lot identified by Plaintiffs as “surplus property” at 23rd and Washington is
 25 immediately adjacent to, and only accessible via, the LASAN Washington Service Yard.
 26 In addition to its inaccessibility from anywhere other than the LASAN yard, which would
 27 not be appropriate to allow non-authorized people to access, the land is fully utilized to

1 store vehicles and other equipment on-site for LASAN use, including its Livability
2 Services Division. It is also adjacent to a S.A.F.E. Center where City and County
3 residents can safely dispose of their household hazardous waste and electronic waste
4 (“S.A.F.E.” stands for “Solvents, Automotive, Flammables, and Electronics). The City
5 does not believe this location is properly suited for safe parking or housing for persons
6 experiencing homelessness.

7 By contrast, the State owned parcel at 16th and Main identified by the Plaintiffs is
8 already the site of a City-funded project to install and maintain 50 pallet shelter housing
9 units for persons experiencing homelessness. The City is negotiating a lease with the
10 California Department of Transportation (Caltrans), which controls the property.
11 Volunteers of America has agreed to operate the site, which, in addition to 50 new
12 housing units, will have bathrooms, supplemented by mobile hygiene units for showers; a
13 facility for case management staff to provide services; and 24-hour security. The City
14 intends to open this facility by the end of the month, and is already reviewing other
15 locations (including other properties owned by Caltrans) where this pallet shelter housing
16 model can be replicated.

17 **II. ADDITIONAL CITY ACTIONS**

18 **A. Hygiene**

19 As previously reported, the City has contracted with its vendors to provide daily
20 service to the 56 hand washing stations and 54 portable toilets that have been deployed in
21 the Skid Row area. In addition, the City’s vendor has deployed four additional portable
22 toilets at the four “high traffic” locations identified by the County where the City had not
23 previously deployed hygiene stations. These additional facilities will also be serviced
24 daily. The City maintains regular supervision over the services provided by the portable
25 hygiene facilities through the enhanced monitoring program operated by LASAN.

26 In addition, the City has distributed over 5,000 reusable and washable cloth masks
27 to persons experiencing homelessness in Skid Row through City-funded programs such
28

1 as the ReFresh Spot, the Pit Stop hygiene stations, the Skid Row Clean Team, and
2 through community partners such as Union Rescue Mission, LA Mission, and Midnight
3 Mission. The City will continue to distribute more masks through its programs and
4 partners as additional orders of masks are received.

5 As also previously reported, the City negotiated a 3-month agreement with Metro
6 LA YMCA to provide people experiencing homelessness with access to hygiene services,
7 including showers and bathrooms, at YMCA community centers. The City's Department
8 of Transportation is providing bus shuttle services to transport persons experiencing
9 homelessness to and from those 8¹ YMCA sites throughout the City. The routes and
10 stops for pickups have been designed with input from LAHSA, which is also providing
11 outreach regarding the availability of these YMCA hygiene services and the bus routes to
12 and from those facilities. There is a route traveling through downtown to bring
13 individuals to the Anderson Munger YMCA located at 4301 West 3rd Street in Los
14 Angeles, with a stop at Union Station and multiple stops in Skid Row. This
15 transportation route is specifically designed to facilitate access to hygiene services for
16 persons experiencing homelessness who are residing in Skid Row.

17 **B. Testing**

18 The City, in partnership with LAHSA and the County Departments of Public
19 Health ("DPH") and Health Services ("DHS"), is deploying a surge of street medical
20 services to mitigate community spread of COVID-19 among unsheltered communities.
21 This surge has five goals:

22 1. Screen persons experiencing homelessness in highly dense encampments for
23 COVID-19 symptoms on a regular basis to ensure their safety;
24 2. Perform rapid result testing in the field for symptomatic clients;

25
26
27
28 ¹ The Stuart M. Ketchum-Downtown YMCA is no longer part of this program.

- 1 3. Quickly triage clients to the appropriate indoor care location (including
- 2 quarantine/isolation beds, Tier 1 hotel beds, and new City shelters) based on
- 3 vulnerability and symptomology;
- 4 4. Integrate street outreach assets with City protocols, resources, and systems
- 5 of emergency care; and
- 6 5. Encourage social distancing in encampments consistent with CDC/DPH
- 7 guidance.

8 To achieve these goals, the City has procured new rapid results testing kits to
9 conduct field-based testing for persons experiencing homeless in Los Angeles. The new
10 field testing systems allow up to 8 tests to be run concurrently and can return test results
11 within 20 minutes at the point of care. This technology will help to exponentially
12 increase the volume of testing for persons experiencing homelessness in Skid Row. The
13 City is anticipating receipt of the first four testing machines and 1,000 testing kits this
14 week, and hopes to scale up over the following weeks to a total of 20 testing machines to
15 be deployed to unsheltered locations throughout the City.

16 The City has a two-prong strategy to deploy these new street medical and outreach
17 services in Skid Row. First, the City is creating a high capacity pop up clinic with rapid
18 results testing in Skid Row. The testing site, to be operated by LAFD, includes socially-
19 distanced waiting rooms, as well as direct referral and transportation to County-run
20 isolation and quarantine sites using LAFD's EMS capabilities. Second, five new
21 clinically-enriched teams are being deployed to bring proactive screening and rapid
22 results testing for COVID-19 on a mobile basis to encampments located in Skid Row.
23 These teams are comprised of LAFD, LAPD, nursing staff from DHS, and outreach
24 teams from LAHSA. The City expects the rapid results testing clinic and mobile teams to
25 be deployed in Skid Row by the end of this week.

26 Outside of Skid Row, the City will create additional multidisciplinary COVID
27 response teams and assign these teams based on encampment density, with the mission to

1 screen and complete safety checks for all encampments. These teams will include
2 representatives from LAPD Homeless Outreach and Proactive Engagement units,
3 LAHSA outreach teams, and clinical staffing from DHS multidisciplinary teams or
4 LAFD EMTs. Teams will conduct COVID-19 symptomology screenings and life safety
5 checks. Beginning this week, teams will be deployed to encampment locations near the
6 Civic Center as well as the Hollywood, Rampart Village, Pacoima, Venice, and Harbor
7 City neighborhoods.

8 As the City's rapid results testing capacities grow, these teams will carry testing
9 equipment into the field to perform proactive testing for any symptomatic individuals at
10 these sites. LAFD will also provide transportation services for COVID-19 positive
11 patients to quarantine and isolation beds operated by the County to help expedite
12 placements at safe and appropriate indoor care locations.

13 The City is also preparing to support persons experiencing homelessness who test
14 positive for COVID-19, but who decline offers of housing in isolation or quarantine
15 units, or clients who are seeking isolation beds, but for whom such beds are not available.
16 The City has procured 600 tents that will be distributed to symptomatic unsheltered
17 residents to facilitate their ability to shelter in place, or other vulnerable unsheltered
18 Angelenos who would benefit from the ability to shelter inside a tent. The City is also
19 working to procure Shelter in Place Kits, which including hygiene supplies, to keep these
20 individuals safe while street medicine teams continue to track their conditions and needs
21 for support.

22 In addition to this proactive testing strategy, the City is working to expand access
23 to testing at clinics and FQHCs that already serve residents experiencing homelessness.
24 The City is providing free COVID-19 testing kits to multiple clinics with large homeless
25 patient populations, including St. John's Well Child, Venice Family Clinic, and JWCH in
26 Skid Row. To date, over 200 residents experiencing homelessness have been tested
27
28

through the program. The City is in active conversation with multiple additional healthcare providers to expand this service City-wide.

C. Emergency Shelters

On March 18, 2020, the City activated the Mass Shelter Expansion Program (MSEP) to bring persons experiencing homelessness indoors to lessen the spread and impact of COVID-19. There are now 20 City recreation centers that are serving as emergency shelters under the MSEP, providing a total of 852 beds. Many of the MSEP shelters currently in operation are full or close to capacity. The City is working to add another 4 sites with an additional 170 beds as soon as appropriate staffing can be identified and deployed.

D. Convention Center

As previously reported, the Los Angeles Convention Center is being set up to house a Medical Relief Center (MRC) that will provide general, low-level recovery and recuperative care for mildly ill patients who are discharged from acute care hospitals or emergency departments, including patients who are difficult to place, such as individuals who are homeless, marginally housed, or who are housed but are unable to return home during their period of isolation/quarantine for a variety of reasons or wound care needs. The City expects to activate 60 beds at the Convention Center facility this week.

E. Modular Housing

In addition to the pallet shelter housing project at 16th and Maple described above, the City continues to explore modular housing options. The City is currently looking for sites of a reasonable size to be operationally efficient for modular products. The City most recently reviewed the possibility of using Caltrans park and ride sites.

Dated: April 13, 2020

MICHAEL N. FEUER, City Attorney

By: /s/ *Scott Marcus*

~~SCOTT MARCUS, Senior Assistant City Attorney
Attorneys for Defendant City of Los Angeles~~